

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America)

v.)

Kristell ALFARO) Case No. 7:18mj 1378

DOB: 1992)

Citizenship: USA)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 5, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 952

Illegal Importation of a Controlled Substance / Approximately 10.84
 Kilograms of Cocaine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Apparated Joseph Leonard
 Sworn to before me and signed in my presence.

Date: 07/06/2018 08:42 a.m.

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Juan Alanis

Printed name and title

Attachment "A"

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On July 5, 2018, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Kristell ALFARO (hereafter ALFARO), a citizen of the United States, while attempting to enter the U.S. with approximately 10.84 kilograms (kg) of cocaine concealed within the rear doors of the Nissan Rouge station wagon she was driving.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred ALFARO and the vehicle to secondary inspection for an intensive examination due to a computer lookout. A CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
3. During secondary inspection, CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies in the rear doors of the vehicle.
4. A physical search of the vehicle was conducted and 10 tape wrapped, vacuum sealed and oil lined packages were discovered concealed within the rear doors of the vehicle. CBPOs field tested the substance inside the packages which were positive for the characteristics of cocaine.
5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Hidalgo POE to assist in the investigation. HSI SAs interviewed ALFARO who stated (post-Miranda warning) she picked up the Nissan Rouge from the Mexico side of the Hidalgo POE and was taking the vehicle to register it in her name. ALFARO denied knowledge of the cocaine, but gave numerous inconsistent statements regarding her itinerary and admitted to not being truthful about numerous matters related to her entry into the U.S.
6. ALFARO will be charged with one count of Illegal Importation of a Controlled Substance, in violation of 21 USC § 952.